REMARKS

The Examiner raised a number of objections to the wording of claims 1 and 3. We have amended the claims to address those concerns and to more particularly point out and distinctly claim the invention. We have also added new dependent claims 9-11. Upon entering the amendment, claims 1-11 will be pending in this application.

The Examiner rejected claim 1-6 under 35 U.S.C. §102(e) as anticipated by U.S. Pub. No. 2002/0091758 to Singh et al. (referred to hereinafter as Singh). In response, we have amended the claims to more clearly distinguish over Singh's technology. More specifically, we have amended claim 1 to recite that the documents for which the geolocating service works are "electronic documents that include unstructured text," and that the function provided by the geolocating service involves "analyzing the unstructured text within the electronic documents…to identify one or more spatial identifiers and from that analysis generating geolocation information for those one or more spatial identifiers found within the electronic documents." In other words, claim 1 is directed to identifying and using a geolocating service which operates on unstructured text.

The phrase "unstructured text" is well known to persons of ordinary skill in the art who would recognize it to be as described in the specification, which states:

> In the examples, it is assumed that among the documents that are sent to the GTS system are documents with "unstructured text" or "free text" or "unfielded data." Such documents would include ordinary English or Spanish or other natural language documents. "Unstructured text" or "free text" documents are to be contrasted with documents or files characterized by "structured data" or "fielded data," such as for example database records or standard 4-line US postal address format data. One of the advantages of the GTS system is that it can generate geographical information for documents in which the geographical information is not found at a specific location in the document but rather is derived from analyzing the content of the document. (page 39, lines 15-23).

We note that Singh's technology involves a geocoding service 110 that does not operate on unstructured text and Singh does not send unstructured text to his geocoding service. Rather, he sends to his geocoding service data sets which list the information that the user wants to be presented on a map. Singh's data sets are structured files in which the data that is to be processed by the geocoding service is presented in predetermined fields (¶ 0083). Singh's

geocoding service then translates the data into physical locations on a map. Singh illustrates this functionality with the following description:

> Geocoding translates an address to a physical location on a map. There are various methods for implementing geocoding. One method applies address ranges to segments of a physical street; for example, segment 186 of Elm Street, in Butte, Mont., contains addresses 500-530. The location of 515 Elm Street, then, is interpolated to be at the midpoint of the segment. This method does not guarantee accuracy; 515 Elm Street may in fact be closer to one of the endpoints, as addresses represent unequal physical areas. (¶ 0066)

We could find no teaching or suggestion by Singh with regard to providing a service of the type which is the subject of the present claims. That is, Singh's technology does not examine <u>unstructured text</u> to identify one or more spatial identifiers for which it then provides geolocation information. Thus, Singh does not disclose or even suggest "electronically transferring the identified client document to the address of the geolocating service so as to receive the geolocating service for the unstructured text within the identified client document," as recited in claim 1.

For the reasons stated above, we believe that the claims are in condition for allowance and therefore ask the Examiner to allow them to issue.

Please apply any charges not covered, or any credits, to Deposit Account No. 08-0219.

Respectfully submitted,

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